

MOTION GRANTED. The Initial Case Management Conference is hereby reset to August 17, 2023 at 8:30 a.m. via telephone. All parties shall call 1-877-336-1831, and when prompted for the access code, enter 7039387# to participate. If a party has difficulty connecting to the call or has been on hold for more than five (5) minutes, please call 615-736-7344.

 **IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**MICHAEL DAVID SILLS and)
MARY SILLS,)
)
Plaintiffs,)
)
v.)
)
SOUTHERN BAPTIST CONVENTION,)
a non-profit corporation; DR. ED)
LITTON, Individually, and as agent)
and/or employee of SOUTHERN)
BAPTIST CONVENTION; LIFEWAY)
CHRISTIAN RESOURCES OF THE)
SOUTHERN BAPTIST CONVENTION,)
a non-profit corporation; JENNIFER)
LYELL, Individually and as agent and/or)
employee of LIFEWAY CHRISTIAN)
RESOURCES OF THE SOUTHERN)
BAPTIST CONVENTION and)
SOUTHERN BAPTIST CONVENTION;)
ERIC GEIGER, Individually and as)
agent and/or employee of LIFEWAY)
CHRISTIAN RESOURCES OF THE)
SOUTHERN BAPTIST CONVENTION)
and SOUTHERN BAPTIST)
CONVENTION; EXECUTIVE)
COMMITTEE OF THE SOUTHERN)
BAPTIST CONVENTION, a non-profit)
corporation; BART BARBER,)
Individually and as agent and/or)
Employee of SOUTHERN BAPTIST)
CONVENTION; WILLIE MCLAURIN,)
Individually and as agent and/or)
employee of SOUTHERN BAPTIST)
CONVENTION and EXECUTIVE)
COMMITTEE OF THE SOUTHERN)
BAPTIST CONVENTION; ROLLAND)
SLADE, Individually and as agent and/or)
employee of SOUTHERN BAPTIST)
CONVENTION and EXECUTIVE)
COMMITTEE OF THE SOUTHERN)
BAPTIST CONVENTION; THE)**

**Case No. 3:23-cv-00478
JUDGE WILLIAM L. CAMPBELL, JR.
Magistrate Judge Frensley**

JURY TRIAL DEMANDED

SOUTHERN BAPTIST)
 THEOLOGICAL SEMINARY, a)
 non-profit corporation; DR. R. ALBERT)
 MOHLER, Individually and as agent)
 and/or employee of THE SOUTHERN)
 BAPTIST THEOLOGICAL SEMINARY)
 and SOUTHERN BAPTIST)
 CONVENTION; SOLUTIONPOINT)
 INTERNATIONAL, INC., a corporation,))
 individually and d/b/a GUIDEPOST)
 SOLUTIONS; and GUIDEPOST)
 SOLUTIONS, LLC a limited liability)
 corporation and agent of the Southern)
 Baptist Convention.)
)
 Defendants.)

MOTION TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE

Pursuant to Local Rules 7.01 and 16.01, Defendant, Guidepost Solutions, LLC, which is joined by Defendants, Lifeway Christian Resources, Jennifer Lyell, Executive Committee of the Southern Baptist Convention, Willie McLaurin, and Rolland Slade (collectively the “Moving Defendants”) respectfully move the Court for a continuance of the Initial Case Management Conference (“ICMC”), currently set to take place telephonically on July 27, 2023 at 9:00 am central time (Doc. No. 4), to a date the week of **September 18, 2023**, after briefing is completed as to all motions to dismiss currently pending before the Court (*See* Doc. Nos. 73, 77, 83, 85, 88 and 91). Alternatively, the Moving Defendants ask that the ICMC be continued to the week of **August 14-17, 2023**¹, should the Court’s calendar allow.

Counsel for all parties have conferred, and the Moving Defendants have permission to represent that none of the parties oppose a continuance of the ICMC to the week of **August 14-17**,

¹ Counsel for Lifeway is not available August 18, 2023.

2023; however, counsel for Plaintiffs object to a continuance to the week of **September 18, 2023**, after briefing is completed on the pending motions to dismiss.

In seeking this extension, the Moving Defendants submit that it would be most productive to complete the briefing process on the pending motions to dismiss prior to setting and engaging discovery schedules so that the parties can better understand one another's positions. For that reason, the Moving Defendants seek a continuance to the week of **September 18, 2023**. None of the Defendants oppose such a continuance, but the Plaintiffs are opposed.

In the event the Court is not inclined to continue the ICMC to a date following completion of the brief, Moving Defendants ask that the Court continue the ICMC to the week of **August 14-17, 2023**, the timing of which none of the parties oppose.

The Moving Defendants respectfully request entry of an Order continuing the ICMC to the week of **September 18, 2023** or, alternatively, the week of **August 14-17, 2023**, as the Court's calendar allows.

Respectfully submitted,

s/Katharine R. Klein

John R. Jacobson, BPR #14365

Katharine R. Klein, BPR #19336

Riley & Jacobson, PLC

1906 West End Avenue

Nashville, TN 37203

(615) 320-3700

(615) 320-3737 *Facsimile*

jjacobson@rjfirm.com

kklein@rjfirm.com

-and-

Steven G. Mintz (admitted *pro hac vice*)
Terence W. McCormick (admitted *pro hac vice*)
Mintz & Gold LLP
600 Third Avenue
25th Floor
New York, NY 10016
Telephone: (212) 696-4848
mintz@mintzandgold.com
mccormick@mintzandgold.com

*Counsel for Defendants
SolutionPoint International, Inc. and
Guidepost Solutions LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the ECF

Court System on this 24th day of July, 2023 on the following:

Gary E. Brewer
Brewer and Terry, P.C.
1702 W. Andrew Johnson Hwy.
P.O. Box 2046
Morristown, TN 37816
robin@brewerandterry.com

John W. Barrett
Katherine Barrett Riley
Barrett Law Group, P.A.
P.O. Box 927
404 Court Square North
Lexington, MS 39095
dbarrett@barrettlawgroup.com
kbriley@barrettlawgroup.com

Shannon M. McNulty
Clifford Law Office, P.C.
120 N. LaSalle Street, 36th Floor
Chicago, IL 60602
mmm@cliffordlaw.com

Attorneys for Plaintiffs

Catherine M. Newman
R. Bruce Barze, Jr.
J. Graham Gilmore
Barze Taylor Noles Lowther LLC
2204 Lakeshore Drive, Suite 425
Birmingham, AL 35209
cnewman@btnllaw.com
bbarze@btnllaw.com
ggilmore@btnllaw.com

Attorneys for Eric Geiger

Ronald G. Harris
Philip N. Elbert
Olivia R. Arboneaux
Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
rharris@nealharwell.com
pelbert@nealharwell.com
oarboneaux@nealharwell.com

Attorneys for Jennifer Lyell

Gino Marchetti, Jr.
Matthew C. Pietsch
Taylor, Pigue & Marchettie & Blair, PLLC
2908 Poston Avenue
Nashville, TN 37203
gmarchetti@tpmblaw.com
matt@tpmblaw.com

*Attorneys for Southern Baptist Convention,
Dr. Ed Litton and Dr. Bart Barber*

George H. Cate, III
Kimberly M. Ingram-Hogan
Bradley Arant Boulton Cummings LLP
1600 Division Street, Suite 700
Nashville, TN 37203
gcate@bradley.com
kingram@bradley.com

Attorneys for LifeWay Christian Resources

James C. Bradshaw, III
Wyatt, Tarrant & Combs, LLP
333 Commerce Street, Suite 1050
Nashville, TN 37201
jbradshaw@wyattfirm.com

Byron Leet
Thomas E. Travis
Wyatt, Tarrant & Combs, LLP
400 West Market Street, Suite 2000
Louisville, KY 40202
bleet@wyattfirm.com
ttravis@wyattfirm.com

*Attorneys for The Southern Baptist
Theological Seminary and Dr. R.
Albert Mohler*

Brigid M. Carpenter
Ryan P. Loofbourrow
Baker, Donelson, Bearman, Caldwell &
Berkowitz, P.C.
1600 West End Avenue, Suite 2000
Nashville, TN 37203
bcarpenter@bakerdonelson.com
rloofbourrow@bakerdonelson.com

*Attorneys for Executive Committee of Southern
Baptist Conventions, Willie McLaurin and
Rolland Slade*

Richard C. Mangelsdorf, Jr.
Terri L. Bernal
McAngus Goudelock & Courie, LLC
P.O. Box 2949
120 Brentwood Commons Way, Suite 625
Brentwood, TN 37024
Chuck.mangelsdorf@mcgclaw.com
Terri.bernal@mcgclaw.com

*Attorneys for Lifeway Christian Resources of
the Southern Baptist Convention*

s/Katharine R. Klein